

1 Scott A. Flinders (6975)
2 Todd W. Prall (9154)
HUTCHISON & STEFFEN, PLLC
Peccole Professional Park
3 10080 West Alta Drive, Suite 200
Las Vegas, Nevada 89145
4 Telephone: 702-385-2500
Facsimile: 702-385-2086
5 lrath@hutchlegal.com
tprall@hutchlegal.com

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 GATEWAY INSURANCE COMPANY, a
11 Missouri corporation,

Case No.: 2:19-cv-00771-APG-BNW

12 Plaintiff,

**STIPULATION AND ORDER TO
AMEND COMPLAINT**

12 || Franklin,

ALEXANDER FERNANDEZ-LEON, an individual; YENDRY HERNANDEZ-ECHEVARRIA, an individual; GRET SIN CONSUEGRA SORIANO, an individual; JUAN SCHUEG-CASTRO, an individual; JOSE PRIETO-HERNANDEZ, an individual; NELLIS CAB LLC, OPERATION SERIES NELLIS CAB LLC, VEH. SERIES 102, a Nevada series limited liability company,

(First Request)

(First Request)

10 Defendants.

20 Plaintiff Gateway Insurance Company by and through its counsel of record, Scott A.
21 Flinders and Todd W. Prall of the law firm Hutchison & Steffen, PLLC, and Defendants
22 Yendry Hernandez-Echevarria, Gretsin Consuegra Soriano, Juan Schueg-Castro, and Jose
23 Prieto-Hernandez, by and through their counsel, Joseph A. Gutierrez and Stephen G. Clough of
24 Maier Gutierrez and Associates, and Nellis Cab, LLC Operation Series, by and through their
25 counsel Thomas E. Winner and Steven P. Canfield of Winner & Sherrod, hereby stipulate ,
26 hereby stipulate and agree that Plaintiff may amend its Complaint to as set forth in the proposed
27 Second Amended Complaint attached to this stipulation as Exhibit 1. The proposed Second
28 Amended Complaint does not change any of the relief sought or add parties. The purpose of

1 the proposed Second Amended Complaint is to add additional factual allegations that have been
2 discovered since the case was initiated.

3 DATED this 6th day of April, 2020.

4 HUTCHISON & STEFFEN, PLLC

5 /s/ Todd W. Prall

6 Scott A. Flinders (6975)
7 Todd W. Prall (9154)
HUTCHISON & STEFFEN, PLLC
8 Peccole Professional Park
10080 West Alta Drive, Suite 200
9 Las Vegas, Nevada 89145

10 *Attorney for Plaintiff*

11 DATED the 6th day of April, 2020

12 WINNER & SHERROD

14 /s/ Steven P. Canfield

15 Thomas E. Winner (5168)
16 Steven P. Canfield (12711)
1117 South Rancho Drive
Las Vegas, Nevada 89102

17 *Attorneys for Nellis Cab, LLC*

DATED this 6th day of April, 2020.

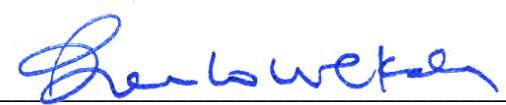
MAIER GUTIERREZ & ASSOCIATES

/s/ Stephen G. Clough

Joseph A. Gutierrez (9046)
Stephen G. Clough (10549)
8816 Spanish Ridge Avenue
Las Vegas, Nevada 89148

Attorneys for Defendants Yendry Hernandez-Echeverria, Gretsin Consuegra Soriano, Juan Schueg-Castro, and Jose Preito-Hernandez

18 IT IS SO ORDERED

20 
21 United States Magistrate Judge

22 Dated: 4/8/2020